Union Electric

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DOCKETED USNRC

December 27, 2005 (2:35pm)

OFFICE OF SECRETARY RULEMAKINGS AND

ADJUDICATIONS STAFF

December 27, 2005

Secretary, U. S. Nuclear Regulatory Commission Washington, DC 20555-0001 ATTN: Rulemakings and Adjudications Staff

ULNRC-05245

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Ladies and Gentlemen:

DOCKET NUMBER 50-483 CALLAWAY PLANT UNIT 1 UNION ELECTRIC CO. FACILITY OPERATING LICENSE NPF-30 COMMENTS ON PROPOSED RULE REGARDING <u>FITNESS FOR DUTY (FFD) PROGRAMS, RIN 3150-AF12</u> (70 FR 50422)

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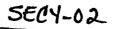
(70FR 50442)

Provided below are comments from the Union Electric Company (AmerenUE, Callaway Plant) on the proposed rulemaking regarding Fitness for Duty (FFD) programs (see 70 FR 50444 dated August 26, 2005). AmerenUE believes that certain aspects of the proposed rule are disruptive or have no value while imposing hardship on licensees and their employees. In particular, the group work hour limits should not be imposed. The proposed 24 hour and 48 hour rest requirements are unnecessarily disruptive of the normal shifts now employed by many licensees. Attached are examples of 8-hour shift rotations that are currently used by departments at Callaway Plant which would not be viable under the proposed rule changes.

In addition, AmerenUE has worked with the Nuclear Energy Institute (NEI) in reviewing this proposed rulemaking and support the comments submitted by the NEI on December 20, 2005 in regard to *Managing Fatigue* and *Drug and Alcohol* portions of the proposed rule.

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AmerenUE appreciates the opportunity to comment on the on the proposed rule regarding fitness for duty programs. If there are any questions regarding these comments, please contact me at 573-676-8659 or David Shafer at 314-554-4104.

Sincerely,

Jamiel Alafen for Keith D. Young Manager - Regulatory Affairs

Enclosure: Shift Rotations

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Enclosure to ULNRC-05245

Shift Rotations: TRIS Work Group #12196 TRIS Work Group #12199

TRIS WORK GROUP #12196 - CHEMISTRY TECHS (Demand)

16 Week Rotation Cycle

WORKING HOURS

AM 7:00-3:00 (0700-1500) PM 3:00-11:00 (1500-2300) OWL 11:00-7:00 (2300-0700)

ROTATION SCHEDULE #1510									
Schedule #	Weeks	S	M	T	W	T	F	S]
179	1			P	P	P	P	P	Work Holidays
211	2	P	P			0	0	0	Work Holidays
210	3	0	0	0	0			A	Work Holidays
163	4	A	A	Α	Α	Α			Work Holidays
156	5-16		A	A	A	A	A		12 Weeks (Friday AM Holidays are canvassed)

Distribution of 6 week schedules:

TRIS WORK GROUP #12199 (Demand) HP OPS R/C TECH (Includes Assistant Tech)

20 week rotation.

WORKING HOURS

AM7:00-3:00 (0700-1500)PM3:00-11:00 (1500-2300)OWL11:00-7:00 (2300-0700)

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Schedule#	Weeks	S	M	T	W	T	F	S]
177	1			Α	A	A	Α	A	Work Holidays
180	2	Α			P	P	Р	P	Work Holidays
189	3	P	P	P			0	0	Work Holidays
164	4	0	0	0	0	0			Work Holidays
156	5-12		A	A	A	A	Α		8 Weeks (Monday AM
									Holidays are canvassed)
155	13		P	P	P	P	P		Don't Work Holidays
156	14-20		A	Α	Α	A	Α		7 Weeks (Monday AM
					•		}		Holidays are canvassed)
] .		{		(the person on last week
									of AMs is canvassed first)

Distribution of 6 week schedules:

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cc: Mr. Bruce S. Mallett Regional Administrator
U.S. Nuclear Regulatory Commission Region IV
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Mr. John O'Neill Pillsbury Winthrop Shaw Pittman LLP 2300 N. Street N.W. Washington. DC 20037 From:"Shafer, David E" <DShafer@ameren.com>To:<SECY@nrc.gov>, <jnd@nrc.gov>Date:Tue, Dec 27, 2005 11:21 AMSubject:Comments on Proposed Rule Regarding Fitness for Duty (FFD) Programs, RIN3150-AF12

Attached is an electronic copy of comments submitted by Union Electric Company (AmerenUE, Callaway Plant) in regards to Proposed Rule Regarding Fitness for Duty (FFD) Programs, RIN 3150-AF12.

<<CALW ULNRC-05245.pdf>>

Dave Shafer

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